IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT COURT OF ILLINOIS EASTERN DIVISION

ANITA PARKER, on behalf of herself

Case No. 1:16-cv-10775

Honorable Samuel Der-Yeghiayan

and all others similarly situated,

Plaintiff,

v.

J. CREW GROUP, INC., J. CREW: L.L.C. and DOES 1 through 100, inclusive:

Defendants.

:

PLAINTIFF'S OPPOSITION TO DEFENDANT J. CREW GROUP, INC.'S MOTION TO: (1) TRANSFER PURSUANT TO 28 U.S.C. § 1404(a); OR (DISMISS PURSUANT TO THE FIRST-FILED DOCTRINE

Plaintiff respectfully requests that the Court deny Defendant J. Crew Group, Inc.'s motion. Defendant seeks to have this case transferred to the District of New Jersey so that Defendant can argue that the District of New Jersey has no jurisdiction. Such gamesmanship does not effect judicial economy, it defeats it. Neither should the Court dismiss Plaintiff's case pursuant to the first-filed doctrine. For the reasons set out in the accompanying brief, Defendant's motion should be denied in its entirety. Instead, this case should be remanded to the Circuit Court of Cook County, Illinois.

Respectfully submitted, this the 18th day of January, 2017.

<u>s/ Brian K. Herrington</u>Brian K. Herrington (admitted *pro hac vice*)HERRINGTON LAW, PA

1520 N. State Street Jackson, MS 39202 T: 601.208.0013 F: 601.235.9947 brian@herringtonlawpa.com

Robert A. Clifford rac@cliffordlaw.com Shannon M. McNulty smm@cliffordlaw.com CLIFFORD LAW OFFICES PC 120 North LaSalle Street, 31st Floor Chicago, IL 60602 Telephone: 312.899.9090

Chant Yedalian (admitted *pro hac vice*) chant@chant.mobi
CHANT & COMPANY
A Professional Law Corporation
1010 N. Central Ave.
Glendale, CA 91202
Telephone: 877.574.7100
Facsimile: 877.574.9411

Attorneys for Plaintiff

chant@chant.mobi

CERTIFICATE OF SERVICE

A copy of the foregoing document was filed electronically on January 18, 2017. Notice of this filing will be sent by e-mail to all counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

DATE: January 18, 2017 s/Brian K. Herrington